

# EXHIBIT 51

**Confidential**



## **Transcript of Nancy Hart**

Sunday, April 10, 2022

***National Coalition on Black Civic Participation, et al. v. Jacob Wohl, et al.***

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Reference Number: 115309

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

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4 NATIONAL COALITION ON BLACK CIVIC PARTICIPATION, MARY  
5 WINTER, GENE STEINBERG, NANCY HART, SARAH WOLFF, KAREN  
6 SLAVEN, KATE KENNEDY, EDA DANIEL, and ANDREA SFERES,

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7 Plaintiffs

8

9 -and-

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11 People of the STATE OF NEW YORK, by its attorney general,  
12 LETITIA JAMES, ATTORNEY GENERAL OF THE STATE OF NEW YORK

12

-vs-

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14 JACOB WOHL, JACK BURKMAN, J.M. BURKMAN & ASSOCIATES, LLC  
15 PROJECT 1599, MESSAGE COMMUNICATIONS, INC., ROBERT MAHANIAN,  
16 and JOHN and JANE DOES 1-10,

15

16 Defendants.

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18 Deposition of NANCY HART, Plaintiff, herein taken by  
19 Defendant, pursuant to Notice via Zoom, on Sunday, April  
20 10th, 2022 at 10:00 a.m., before Paula D. Bielat, a  
21 shorthand reporter and notary public within and for the  
22 State of New York.

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1 APPEARANCES :

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1 A I'm white.

2 Q What are your current political affiliations?

3 MR. GOLD: Objection.

4 THE WITNESS: I'm a registered democrat.

5 MR. KLEINMAN: And when you say a registered  
6 democrat, does that mean you're  
7 registered to vote?

8 THE WITNESS: Yes.

9 BY MR. KLEINMAN:

10 Q How long have you been registered to vote for?

11 A Since I was 18 years old.

12 Q And have you been registered as a democrat since  
13 you've been registered to vote?

14 A Yes.

15 Q Did you vote in the 2020 presidential election?

16 A I did.

17 Q Did you vote in-person or by mail?

18 A In-person.

19 Q Is there a particular reason you decided to vote  
20 in-person?

21 A No.

22 Q Prior to the November 2020 presidential election,  
23 did you vote in-person in other federal, state  
24 and local elections?

25 A Yes.

1 knowledge of them, they have promoted falsehoods  
2 in many different areas including this.

3 Q Okay. Is this based on those few things that you  
4 mentioned, you've testified to earlier?

5 A Based on having seen many things on Twitter and  
6 in the media.

7 Q Is there anything you haven't testified to that  
8 you can recall right now that would lead you to  
9 support that statement?

10 A Not that I can recall.

11 Q Okay. And you understand you're a Plaintiff in  
12 this lawsuit, correct?

13 A Yes.

14 Q And that this Complaint was filed on your behalf,  
15 correct?

16 A Yes.

17 Q Aside from what you mentioned, did you conduct  
18 your own independent investigation into Mr. Wohl  
19 or Mr. Burkman at any point in time?

20 A No.

21 Q Can you take a moment, please, to just review  
22 Paragraph 100.

23 A Okay.

24 Q What irreparable harm did you personally face as  
25 a result of the robocall?

1 MR. GOLD: Objection.

2 THE WITNESS: I believe there was most likely some  
3 harm to my credibility having refuted  
4 these statements numerous times from  
5 other sources to have them once again  
6 come up.

7 MR. KLEINMAN: Has anyone in particular told you that  
8 your credibility was diminished  
9 because of this call?

10 MR. GOLD: Objection.

11 THE WITNESS: No.

12 MR. KLEINMAN: So your belief, that's merely your  
13 opinion, correct?

14 THE WITNESS: Yes.

15 BY MR. KLEINMAN:

16 Q Okay. And this alleged reputational harm, is it  
17 permanent?

18 A Potentially.

19 Q Do you believe it could be repaired in any way?

20 A Potentially.

21 Q Okay. And how could you potentially repair it?

22 A That's the question.

23 Q What effort, if any, have you taken to repair  
24 your reputation as a result of this?

25 A Reiterate the facts that I know and source myself

1 BY MR. GOLD:

2 Q No?

3 A It depend on the location.

4 Q Gotcha. So is it fair to say it can?

5 A It can.

6 Q How many hours of your personal and professional  
7 time did you spend prior to the 2020 election to  
8 promote civic participation in voting?

9 A Probably, maybe thousands.

10 Q And when you first heard that robocall, how did  
11 it make you feel?

12 A I was frustrated and angry.

13 Q And why were you frustrated and angry?

14 A Because again, as I've testified previously, I  
15 have spent hours and days and months of my  
16 professional career trying to convince people  
17 that these things are not true and that they  
18 should be registered to vote, they should be  
19 voting and then this comes along. And again,  
20 because I have experience with people and how  
21 they take in information, obviously I know how  
22 this can affect their perception of what I have  
23 told them.

24 Q So you believe, in your view, that the robocall  
25 counteracted your professional effort?



1 A Yes.

2 Q Why is that?

3 A It's a matter of perception. It's very difficult  
4 to put more faith in the person sitting next to  
5 you than it is to put your faith in a  
6 corporation, so to speak, which is a perception  
7 of people who robocall you. Most robocalls are  
8 not personally generated, they're generated for a  
9 corporation, organization, pack, whatever, for  
10 some sort of gain.

11 MR. GOLD: I don't think we have any further  
12 questions at this time.

13 MR. KLEINMAN: Nor do we. Okay. Thank you.

14 MR. GOLD: I'm sorry, one more question.

15 RE-EXAMINATION

16 BY MR. GOLD:

17 Q When you heard the original robocall, did you  
18 believe that was a human voice?

19 A Yes.

20 Q Why do you believe that was a human voice?

21 A Because of the variations in tone and emotion in  
22 the speech.

23 Q In your experience, is a computer generated voice  
24 capable of creating such various tones and  
25 emotions?

## C E R T I F I C A T I O N

THIS IS TO CERTIFY, THAT I, PAULA D. BIELAT, on Sunday, April 10th, 2022, reported the proceedings contained in the foregoing 96 pages at the time and place as set forth in the heading in the foregoing matter. That the transcript is a true and accurate transcription of my stenographic notes, using Computer Aided Transcription, to the best of my ability.

A handwritten signature in black ink, appearing to read 'Paula D. Bielat', is written over a horizontal line.

PAULA D. BIELAT, Court Reporter